

Title V Application Review

Crude Oil Pumping Station

Project #: 961136

Deemed Complete: January 7, 1997

Engineer: S. Munir

Date: December 7, 2001

Facility Number: S-1394

Facility Name: Chevron Pipe Line Company - Bitterwater Pump Station

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Responsible Official: Rich Hartig

Title: West Coast Corridor System Team Leader

I. PROPOSAL

Chevron Pipe Line Company is proposing that the initial Title V Operating Permit be issued for its existing Bitterwater Pumping Station facility located near Cholame in western Kern County. The purpose of this engineering evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

The Bitterwater Pumping Station is located at Section 12, Township 30 south, Range 18 east in Kern County, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit templates:

A. SJV-UM-0-0 Facility-Wide Umbrella General Permit Template

The applicant has requested to utilize template SJV-UM-0-0, Umbrella General Permit Template, for the entire facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. SJV-IC-4-0 Series 4 Internal Combustion Engines

The applicant has requested to utilize template SJV-IC-4-0, Series 4 Internal Combustion Engines, for the 53 h.p. engine (permit unit S-1394-56-1). Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for the model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and public review:

- Conditions 1 through 39 of the facility wide requirements (S-1394-0-0)
- Conditions 1 through 7 of the requirements for permit unit S-1394-56-1

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100 Equipment Breakdown (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 111)²

District Rule 1160 Emission Statements (Adopted November 18, 1992, 1992)²

District Rule 2010 Permits Required (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 201)²

District Rule 2020 Exemptions (Amended July 21, 1994) (Non SIP replacement for Kern County Rule 202)²

District Rule 2031 Transfer of Permits (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 203)²

District Rule 2040 Applications (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 204)²

District Rule 2070 Standards for Granting Applications (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 208)²

District Rule 2080 Conditional Approval (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 209)²

District Rule 2520 Federally Mandated Operating Permits - except section 9.4.2 (Adopted June 15, 1995)²

District Rule 4101 Visible Emissions (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 401)²

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992)¹ (Non SIP replacement for Kern County Rule 404)

District Rule 4601 Architectural Coatings (Amended December 17, 1992)²

District Rule 4801 Sulfur Compounds (Amended December 17, 1992)¹ (Non SIP replacement for Kern County Rule 407)

¹ Model General Permit Template SJV-IC-4-0 addressed these requirements only for permit unit S-1394-56-1.

² The Umbrella General Permit Template addressed these requirements for all permit units at the facility.

District Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Construction, Demolition, Excavation, and Extraction Activities (Amended April 25, 1996)²

District Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Handling and Storage of Bulk Materials (Amended April 25, 1996)²

District Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Paved and Unpaved Roads (Amended April 25, 1996)²

40 CFR Part 61 Subpart M National Emission Standard for Asbestos²

40 CFR Part 82 Subpart F Stratospheric Ozone²

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District New and Modified Stationary Source Review Rule

District Rule 1081 Source Sampling (Amended December 17, 1992)³ (Non SIP replacement for Kern County Rule 108.1)

District Rule 2520 Federally Mandated Operating Permits - section 9.4.2 (Adopted June 15, 1995)

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992)³ (Non SIP replacement for Kern County Rule 404)

District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 408)

District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992)

District Rule 4801 Sulfur Compounds (Amended December 17, 1992)³ (Non SIP replacement for Kern County Rule 407)

¹ Model General Permit Template SJV-IC-4-0 addressed these requirements only for permit unit S-1394-56-1.

² The Umbrella General Permit Template addressed these requirements for all permit units at the facility.

³ Model General Permit Template SJV-IC-4-0 addressed these requirements for permit unit S-1394-56-1. This requirement is addressed outside the Model General Permit Template for the remaining units at the facility.

40 CFR 60, Subpart Ka Standards of Performance for Storage Vessels for Petroleum Liquids.....

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permit. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through the Title V Permit".

The facility is subject to the following District rules which are not currently Federally Enforceable:

- District Rule 4102 - Nuisance (Amended December 17, 1992)
- District Rules 4305 and 4351 - Boilers, Steam Generators and Process Heaters (Amended December 19, 1996) and Boilers, Steam Generators and Process Heaters, Reasonably Available Control Technology (Amended December 19, 1995)

For this facility, condition 15 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1, condition 2 of the requirements for permit units S-1394-55-1 and S-1394-57-1, and conditions 8 and 13 of the requirements for permit unit S-1394-56-1 are based on the rule identified above and are not Federally Enforceable Through the Title V Permit.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements (S-1394-0-0) as condition numbers 1 through 39 to assure compliance with these requirements.

- #### **2. 53 horsepower i.c. engine fired on propane, driving a 35 kW Onan emergency generator set (S-1394-56-1)**

The applicant is proposing to use a general permit template to address federally applicable requirements for the 53 horsepower i.c. engine fired on propane, driving a 35 kW Onan emergency generator set (S-1394-56-1). Section IV of template SJV-IC-4-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit unit S-1394-56-1 as condition numbers 1 through 7 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

1. New and Modified Stationary Source Review Rule (District NSR Rule)

a. 18 MMBtu/hr HRT boiler (S-1394-2-1)

ATC No. 4041005 was issued by the Kern County APCD on January 27, 1976. This permit unit was installed prior to the date NSR requirements were established in Kern County (December 28, 1976) and has not been modified since that time. Therefore, District NSR requirements do not apply to this unit.

b. 18 MMBtu/hr HRT boiler (S-1394-3-1)

ATC No. 4041006 was issued by the Kern County APCD on January 27, 1976. This permit unit was installed prior to the date NSR requirements were established in Kern County (December 28, 1976) and has not been modified since that time. Therefore, District NSR requirements do not apply to this unit.

c. 18 MMBtu/hr HRT boiler (S-1394-4-1)

Permit No. 4041002 was issued by the Kern County APCD on April 4, 1974. This permit unit was installed prior to the date NSR requirements were established in Kern County (December 28, 1976) and has not been modified since that time. Therefore, District NSR requirements do not apply to this unit.

d. 2,150 bbl fixed roof crude oil tank #763 (S-1394-55-1)

Permit unit S-1394-55-1 was not subject to the District NSR Rule at the time the unit was installed. In-house Permit to Operate (PTO) No. S-1394-55-0 was issued by the District on March 13, 1995. The unit was required to be permitted when the District lowered the Rule 2020 exemption level for oil storage containers to 100 bbl.

- e. 53 horsepower i.c. engine fired on propane, driving a 35 kW Onan emergency generator set (S-1394-56-1)

Permit unit S-1394-56-1 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. ATC No. S-1394-56-0 was issued by the District on March 13, 1995.

- Condition 1 from the ATC was included as condition 8 of the requirements for permit unit S-1394-56-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 and 3 from the ATC assured that this engine met the definition of a standby engine in District Rule 4701. These conditions also allowed the engine to be exempt from offsets pursuant to the District NSR Rule. These conditions were included as conditions 9 and 10 of the requirements for permit unit S-1394-56-1.
- Condition 4 from the ATC specified Best Available Control Technology (BACT) pursuant to the District NSR Rule and was included as condition 11 of the requirements for permit unit S-1394-56-1.
- Condition 5 from the ATC specified the type of fuel to be fired in the unit and was incorporated in condition 1 of the requirements for permit unit S-1394-56-1.
- Condition 6 from the ATC specified Best Available Control Technology (BACT) pursuant to the District NSR Rule and was included as condition 12 of the requirements for permit unit S-1394-56-1.
- Condition 7 from the ATC required recordkeeping to assure compliance with District Rule 4701. This condition was included as condition 13 of the requirements for permit unit S-1394-56-1. The part of condition 7 from the ATC

requiring a minimum of two year record retention was not included in the requirements for this permit unit. Condition 9 of the facility wide requirements (S-1394-0-0) mandates five year retention of all records.

f. 23,100 gallon fixed roof crude oil tank #774 (S-1394-57-1)

Permit unit S-1394-57-1 was not subject to the District NSR Rule at the time the unit was installed. In-house Permit to Operate (PTO) No. S-1394-57-0 was issued by the District on December 20, 1996. The unit was required to be permitted when the District lowered the Rule 2020 exemption level for oil storage containers to 100 bbl.

2. District Rule 1081 - Source Sampling

a. 18 MMBtu/hr HRT boiler (S-1394-2-1), 18 MMBtu/hr HRT boiler (S-1394-3-1), and 18 MMBtu/hr HRT boiler (S-1394-4-1).

District Rule 1081 has been submitted to the EPA to replace Kern County Rule 108.1 which is SIP approved. District Rule 1081 is as stringent as Kern County Rule 108.1:

Table 1 - Comparison of District Rule 1081 and Kern County Rule 108.1

REQUIREMENTS	1081 SJVUAPCD	108.1 KERN
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample	✓	✓
The source shall have District personnel present at a source test	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of District Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively. These requirements are covered

by condition 1 of the requirements for permit units S-1394-2-1, S-1394-3-1, and S-1394-4-1.

3. District Rule 2520, section 9.4.2 - Federally Mandated Operating Permits

- a. 18 MMBtu/hr HRT boiler (S-1394-2-1), 18 MMBtu/hr HRT boiler (S-1394-3-1), and 18 MMBtu/hr HRT boiler (S-1394-4-1).

Section 9.4.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance. Periodic monitoring consisting of testing and sampling is supported by permit conditions 2, 4, 6 through 9, 17, 18 and 19 of the requirements for permit units S-1394-2-1, S-1394-3-1, and S-1394-4-1. These conditions require the operator to retain copies of fuel invoices, perform source testing to show compliance with particulate matter limitations, test the sulfur content of the fuel to show compliance with the SO_x limitations, and record the origin and type of oil fired in the unit.

- b. 2,150 bbl fixed roof crude oil equalizer tank #763 (S-1394-55-1) and 23,100 gallon fixed roof oil storage tank #774 (S-1394-57-1)

Section 9.4.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance. Periodic monitoring consisting of testing is supported by permit condition 3 of the requirements for permit units S-1394-55-1 and S-1394-57-1. This condition requires the operator to test the true vapor pressure of the liquid in support of the permitted vapor pressure limitations.

4. District Rule 4201 - Particulate Matter Concentration

EPA issued a relative stringency finding, dated August 20, 1996, stating that District Rule 4201 is more stringent than SIP approved Kern County Rule 404. Section 3.1 of District Rule 4201 requires

emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas.

- a. 18 MMBtu/hr HRT boiler (S-1394-2-1), 18 MMBtu/hr HRT boiler (S-1394-3-1), and 18 MMBtu/hr HRT boiler (S-1394-4-1).

Permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1 are boilers fired on crude oil. The following calculations, using AP-42 emission factors for No. 6 fuel oil, demonstrate that the emission of PM for these units are expected to comply with the limit of this rule.

equation 1

$$\left(\frac{14.2 \text{ lb PM}}{10^3 \text{ gal}} \right) \left(\frac{1 \text{ gal}}{150,000 \text{ Btu}} \right) \left(\frac{1 \text{ MMBtu}}{9190 \text{ dscf}} \right) \left(\frac{7000 \text{ gr}}{1 \text{ lb}} \right) = \left(\frac{0.07 \text{ grain}}{\text{dscf}} \right) < \left(\frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$$\frac{14.2 \text{ lb PM}}{10^3 \text{ gal}} = \text{emission factor for filterable PM, No. 6 fuel oil}^4, (\text{AP-42, Table 1.3-1 using the permitted limit of 1.2\% sulfur}) [\text{where emission factor} = 9.19(\text{S}) + 3.22]$$

$$\frac{150,000 \text{ Btu}}{1 \text{ gal crude oil}} = \text{heating value of crude oil (AP-42, Appendix A)}$$

$$\frac{9190 \text{ dscf}}{\text{MMBtu}} = \text{F factor, } F_d, \text{ for oil (40CFR60, App. A, Meth. 19, Table 19-1)}$$

⁴ In the absence of reliable emission factors for crude oil combustion, the emission factor for No. 6 fuel oil is commonly used to calculate emissions from crude oil combustion. Since No. 6 fuel oil is a heavier fuel than crude oil, using those emission factors should result in a worst case particulate emission level for the combustion of crude oil.

Equation 1 demonstrates that the emissions of PM are expected to be below the applicable limits for the units while firing crude oil. The units are limited by permit condition to firing oil with a sulfur content not exceeding 1.2%. Conditions 3, 14 and 16 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1 assure compliance with District Rule 4201.

Because the emission calculation using AP-42 factors results in an emission level very close to the District Rule 4201 limit, periodic compliance testing is required in condition 4 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

5. District Rule 4301 - Fuel Burning Equipment

EPA issued a relative stringency finding, dated August 20, 1996, stating that District Rule 4301 is more stringent than SIP approved Kern County Rule 408 which is SIP approved.

- a. 18 MMBtu/hr HRT boiler (S-1394-2-1), 18 MMBtu/hr HRT boiler (S-1394-3-1), and 18 MMBtu/hr HRT boiler (S-1394-4-1).

Section 5.2.1 of District Rule 4301 limits the emission of SO_x to 200 lb/hr (calculated as SO₂). The following analysis demonstrates that compliance is expected:

The following calculations, using AP-42 emission factors for crude oil, demonstrate that the emissions of SO_x for these units comply with the limit of this rule. The units are limited by permit condition to firing oil with a sulfur content not exceeding 1.2%. By complying with the permit condition, these units will be in compliance with this section of Rule 4301. Periodic monitoring of fuel sulfur content is required by conditions 6, 7 and 8 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

equation 2

$$\frac{\left(\frac{0.012 \text{ lb S}}{\text{lb fuel oil}}\right)\left(\frac{7.3 \text{ lb crude oil}}{1 \text{ gallon crude oil}}\right)\left(18 \frac{\text{MMBtu}}{\text{hr}}\right)}{\left(\frac{0.15 \text{ MMBtu}}{1 \text{ gallon crude oil}}\right)} = 10.5 \frac{\text{lb} \cdot \text{S}}{\text{hr}} = 21 \frac{\text{lb} \cdot \text{SO}_x}{\text{hr}} < 200 \text{ lb/hr}$$

where:

$$\left(\frac{7.3 \text{ lb crude oil}}{1 \text{ gallon crude oil}}\right) \text{ the density of crude oil (AP-42 Appendix A)}$$

$$\left(18 \frac{MMBtu}{hr}\right) = \text{maximum rated heat input for this unit}$$

$$\left(\frac{0.15 MMBtu}{1 \text{ gallon crude oil}}\right) = \text{higher heating value of crude oil (AP-42 Appendix A)}$$

$$\left(\frac{0.012 \text{ lb S}}{\text{lb oil}}\right) = \text{permitted sulfur content for this unit}$$

To assure compliance with Section 5.2.1 of District Rule 4301, condition 16 has been included in the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

Section 5.2.2 of District Rule 4301 limits the emission of NO_x to 140 lb/hr (calculated as NO₂). The following calculations, using AP-42 emission factors for crude oil, demonstrate that the emission of NO_x for these units is expected to comply with the limit of this rule.

equation 3

CRUDE OIL FIRED:

$$\left(\frac{55 \frac{lb \cdot NO_x}{10^3 \cdot gal}}{0.15 \frac{MMBtu}{gal}}\right) \left(18 \frac{MMBtu}{hr}\right) = 6.6 \frac{lb \cdot NO_x}{hr} < 140 \text{ lb/hr}$$

where:

$$55 \frac{lb \cdot NO_x}{10^3 \cdot gal} = \text{uncontrolled NO}_x \text{ emission factor for crude oil fired (AP42, Table 1.3-2)}$$

$$0.15 \frac{MMBtu}{gal} = 150,000 \frac{Btu}{gal} = \text{heating value for crude oil (AP42, Table 1.4-2)}$$

Equation 3 demonstrates that emissions of NO_x are expected to comply with the District Rule 4301 limit of 140 lb/hr. To assure compliance with Section 5.2.2 of District Rule 4301, conditions 10 and 20 have been included in the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1. Since compliance is expected under all operating conditions, no recordkeeping, reporting or monitoring will be required to show compliance with this section of District Rule 4301.

Section 5.2.3 of District Rule 4301 limits the emission of PM to 10 lb/hr. The following analysis demonstrates that compliance is expected.

For the units while fired on oil, the 12% CO₂ correction required by District Rule 4301 in the exhaust stream occurs at 4% O₂. A more conservative analysis is obtained by calculating emissions at 0% O₂ and thus, the following compliance analysis uses F-factors uncorrected from 0% O₂.

equation 4

$$\left(\frac{14.2 \text{ lb PM}}{10^3 \text{ gal}} \right) \left(\frac{1 \text{ gal}}{150,000 \text{ Btu}} \right) \left(\frac{18 \text{ MMBtu}}{\text{hr}} \right) = 1.7 \frac{\text{lb PM}}{\text{hr}} < 10 \frac{\text{lb PM}}{\text{hr}}$$

where:

$$\frac{14.2 \text{ lb PM}}{10^3 \text{ gal}} = \text{emission factor for filterable PM, No. 6 fuel oil, (AP-42, Table 1.3-1 using the permitted limit of 1.2% sulfur) [where emission factor = 9.19(S) + 3.22]}$$

$$\frac{150,000 \text{ Btu}}{1 \text{ gal crude oil}} = \text{heating value of crude oil (AP-42, Appendix A)}$$

Equation 4 demonstrates that the emissions of PM are expected to be well below the applicable limit. Since compliance is expected under all operating conditions, no testing, recordkeeping, reporting, or monitoring will be required to show compliance with this section of District Rule 4301. Condition 3 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1 assures compliance with section 5.2.3 of District Rule 4301.

6. District Rule 4801 - Sulfur Compounds

District Rule 4801 has been submitted to the EPA to replace Kern County Rule 407 which is in the SIP. District Rule 4801 is as stringent as Kern County Rule 407, as shown on Table 2.

Table 2 - Comparison of District Rule 4801 and Kern County Rule 407

REQUIREMENTS	4801 District	407 Kern
a person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

- a. 18 MMBtu/hr HRT boiler (S-1394-2-1), 18 MMBtu/hr HRT boiler (S-1394-3-1), and 18 MMBtu/hr HRT boiler (S-1394-4-1).

Permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1 are boilers fired on crude oil. The following calculations, using AP-42 emission factors for crude oil, demonstrate that the emission of SO_x for these units is expected to comply with the limit of this rule.

equation 5

$$\frac{\left(\frac{188.4 \text{ lb } SO_x}{10^3 \text{ gal oil}}\right)\left(\frac{23.7 \text{ L } SO_2}{\text{gmol } SO_2}\right)\left(\frac{0.035315 \text{ dscf } SO_2}{\text{L } SO_2}\right)\left(\frac{453.59 \text{ g } SO_2}{\text{lb } SO_2}\right)}{\left(\frac{9190 \text{ dscf exhaust}}{\text{MMBtu}}\right)\left(\frac{64.14 \text{ g } SO_2}{\text{gmol } SO_2}\right)\left(\frac{150 \text{ MMBtu}}{10^3 \text{ gal oil}}\right)} = \left(\frac{0.0008 \text{ dscf } SO_2}{\text{dscf exhaust}}\right) = 800 \text{ ppmv} < 2000 \text{ ppmv}$$

where:

$$\frac{188.4 \text{ lb } SO_2}{10^3 \text{ gal}} = \text{uncontrolled emission factor for } SO_2 \text{ (AP-42, Table 1.3-1 using the permitted limit of 1.2\% sulfur) [where emission factor = 157(S)]}$$

$$23.7 \frac{\text{L}}{\text{gmol}} = \frac{(288.71\text{K})\left(22.4 \frac{\text{L}}{\text{gmol}}\right)}{273.15\text{K}} = \text{molar volume of an ideal gas corrected to District standard conditions (60° F, 14.7 psi) per Charles' Law}$$

$$0.035315 \frac{\text{dscf}}{\text{L}} = \text{conversion factor (AP-42, Appendix A)}$$

$$453.59 \frac{\text{g}}{\text{lb}} = \text{conversion factor (AP-42, Appendix A)}$$

$$9190 \frac{\text{dscf}}{\text{MMBtu}} = \text{F-factor, } F_d, \text{ for oil (40 CFR § 60, App. A, Meth. 19, Table 19-1)}$$

$$64.14 \frac{g \cdot SO_2}{gmol} = \text{molecular weight, } SO_2$$

$$\frac{150 \text{ MM } Btu}{1000 \text{ gal oil}} = \text{heating value of crude oil (AP-42, Appendix A)}$$

$$0.002 \frac{dscf \cdot SO_2}{dscf \cdot exhaust} = \text{District Rule 4801 and Kern County Rule 407 limit}$$

Equation 5 demonstrates that the emissions of SO_2 are expected to be below the applicable limits. Condition 9 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1 assures compliance with District Rule 4801. Periodic monitoring of fuel sulfur content is required by conditions 6, 7 and 8 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

7. District Rule 4623 - Storage of Organic Liquids and 40 CFR 60, Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids.....
 - a. 2,150 bbl fixed roof crude oil equalizer tank #763 (S-1394-55-1) and 23,100 gallon fixed roof oil storage tank #774 (S-1394-57-1)

In District Rule 4623, the term “organic liquid” is defined in section 3.7 as “any liquid which contains VOCs and has a True Vapor Pressure (TVP) greater than 1.5 psia at actual storage conditions”. Likewise, the control requirements of 40 CFR 60, Subpart Ka only apply to tanks which store liquids with a TVP greater than 1.5 psia. Condition 1 of the requirements for permit units S-1394-55-1 and S-1394-57-1 specifies that the liquids stored in these tanks must have a TVP less than 1.5 psia, thereby exempting the tanks from the requirements of District Rule 4623 and 40 CFR 60, Subpart Ka.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Operating Permit. Compliance with the terms and conditions of the Operating

Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By submitting model general permit template SJV-UM-0-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in the model general permit template is included as conditions 38 and 39 of the facility wide requirements (S-1394-0-0).

By submitting model general permit template SJV-IC-4-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in the model general permit template is included as conditions 6 and 7 of the requirements for permit unit S-1394-56-1.

B. Requirements not Addressed by Model General Permit Templates

The applicant is requesting a permit shield for each of the following requirements:

1. District Rule 1081 and Kern County Rule 108.1

Compliance with the requirements of these rules was addressed in Section IX of this document and is assured by condition 1 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1. Therefore, a permit shield is being granted for these requirements in conditions 11 and 12 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

2. District Rules 4201 and Kern County Rules 404

Compliance with the requirements of these rules was addressed in Section IX of this document and is assured by conditions 3, 13, 14 and 16 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1. Therefore, a permit shield is being granted for these requirements in conditions 11 and 12 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

3. District Rule 4301 and Kern County Rule 408

Compliance with the requirements of these rules was addressed in Section IX of this document and is assured by conditions 3, 5, 10, and 16 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1. Therefore, a permit shield is being granted for these requirements in conditions 11 and 12 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

4. District Rule 4801 and Kern County Rule 407

Compliance with the requirements of these rules was addressed in Section IX of this document and is assured by conditions 9 and 16 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1. Therefore, a permit shield is being granted for these requirements in conditions 11 and 12 of the requirements for permit units S-1394-2-1, S-1394-3-1 and S-1394-4-1.

5. District Rule 4305

The applicant has requested a permit shield be issued for the Federally Applicable portions of District Rule 4305. Section 2.2 of Rule 4305 states that compliance with the rule for units located west of Interstate Highway 5 in Fresno, Kings, or Kern County is not Federally Enforceable. This provision does not, however, relieve the owner from complying with the rule under District-only enforceability. Therefore, no permit shield will be granted from this rule.

XI. PERMIT CONDITIONS

See attached draft Operating Permits.

XII. EPA AND PUBLIC COMMENTS

See Attachment D.

Attachment A

Permitted Equipment

Attachment B

Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003,
Insignificant Activities

Exemption Category	Rule 2020 Citation
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.2.3
Use of less than 2 gal/day of graphic arts materials.	5.4
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	5.1.2
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	5.1.3
Space heating equipment other than boilers.	5.1.4
Locomotives, airplanes, and watercraft used to transport passengers or freight.	5.2
Cooling towers with a circulation rate less than 10,000 gal/min.	5.3
Equipment at retail establishments used to prepare food for human consumption.	5.5.1
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	5.5.2
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	5.6
Containers used to store clean produced water.	5.7.1
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762 .	5.7.2
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762 .	5.7.3
Brazing, soldering, or welding equipment.	5.10.1
Fugitive emissions sources associated with exempt equipment.	5.10.3
Equipment used to compress natural gas.	5.10.2
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 150	5.7.4

Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	5.7.5
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042 .	5.7.6
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251 .	5.7.7
Containers used to store refined lubricating oils.	5.7.8
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	5.7.9 or 5.10.4
Portable tanks used exclusively to store produced fluids for \leq six months.	5.7.10
Mobile transport tanks on vehicles for delivery of VOCs.	5.7.11
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251 .	5.8.1.1
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762 .	5.8.1.2
Equipment used to apply architectural coatings.	5.9.1
Equipment used exclusively for the transfer of refined lubricating oil.	5.8.2
Unheated, non-conveyorized degreasers < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr evaporative losses.	5.9.2
Pits and Ponds as defined in Rule 1020.	5.10.6
Non-structural repairs & maintenance to permitted equipment.	4.2.6
Emissions less than 2 lb/day from units not included above.	4.2.1

ATTACHMENT C

AUTHORITIES TO CONSTRUCT (ATCs) AND PERMITS TO OPERATE (PTOs)

Attachment D

Comments and Responses

EPA COMMENTS / DISTRICT RESPONSE

The EPA's comments regarding the proposed Title V Operating Permit for Chevron Kettleman Compressor Station (District facility S-1394) is encapsulated below followed by the District's response. A copy of EPA's February 18, 1998 letter is available at the District office.

1. EPA COMMENT

....distinction between "exempt equipment" and "insignificant activities".....

DISTRICT RESPONSE

The statement "this equipment is not exempt from facility wide requirements" has been added to section III of the Engineering Evaluation.

2. EPA COMMENT

....condition 38 of the facility wide requirements grants a permit shield for SIP rules based more recent District regulations....District should provide a demonstration to show that District Rules assure compliance with the SIP rules they replace....

DISTRICT RESPONSE

The following stringency analysis are provided in response to this comment:

1. District Rule 1100

Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. These requirements are addressed in the facility wide requirements as conditions 1, 2 and 11. District Rule 1100 has been submitted to the EPA to replace Kern County Rule 111 which is SIP approved. District Rule 1100 is as stringent as Kern County Rule 111, as shown on Table 1.

Table 1 - Comparison of District Rule 1100 and Kern County Rule 111

Requirement	District 1100	Kern 111
Report breakdown occurrence as soon as reasonably possible but no later than 1 hour after detection (2 hours for Kern County Rule)	✓	✓
Obtain variance if occurrence will last longer than a production run or 24 hours whichever is shorter (96 hours for CEM systems)	✓	✓
Submit a report to the APCO within 10 days of the correction of the breakdown occurrence which includes the following: 1) a statement that the breakdown condition has been corrected, and the date of correction and proof of compliance, 2) a specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition, 3) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future, 4) an estimate of the emissions caused by the breakdown condition, and 5) pictures of the equipment or controls which failed if available.	✓	✓

2. District Rule 1160

Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NO_x) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board (ARB) with an emission inventory of sources emitting greater than 10 tons per year of NO_x or ROGs based on the use of emission factors acceptable to ARB. Condition 3 of the facility wide requirements assures compliance with this rule.

3. District Rules 2010 and 2020

District Rule 2010 sections 3.0 and 4.0 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted. District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. These requirements are stated in condition 4 of the facility wide requirements.

District Rules 2010 and 2020 have been submitted to the EPA to replace Kern County Rules 201 and 202 which are SIP approved. The

District Rules are as stringent as the Kern County Rules, as shown on Tables 2 and 3.

Table 2 - Comparison of District Rule 2010 and Kern County Rule 201

Requirement	District 2010	Kern 201
Any person building or replacing equipment must apply for an Authority to Construct.	✓	✓
Any person altering equipment must apply for an Authority to Construct.	✓	✓
Before operation, a Permit to Operate must be obtained.	✓	✓
A Permit to Operate must be posted on the equipment.	✓	✓
A person shall not willfully deface, alter, forge, counterfeit, or falsify a Permit to Operate.	✓	✓
The Authority to Construct shall serve as a temporary Permit to Operate for newly constructed or modified sources. The application for a Permit to Operate shall serve as a temporary Permit to Operate for existing sources that apply for a Permit to Operate.	✓	✓

Table 3 - Comparison of District Rule 2020 and Kern County Rule 202

Requirements	District 2020	Kern 202
An ATC or PTO is not required for listed exempt equipment.	✓	✓
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	✓	
Recordkeeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	✓	
A compliance schedule is stated for equipment which loses exemption from permitting, necessitating submission of a PTO application.	✓	

4. District Rules 2031, 2070 and 2080

These rules set forth requirements to comply with all conditions of the Permit to Operate. Permits to Operate or Authorities to Construct are not transferable unless a new application is filed with and approved by the District. All source operations must be constructed and operated as specified in the Authority to Construct. Conditions 5 and 6 of the facility wide requirements assure compliance with these rules.

District Rules 2031, 2070 and 2080 have been submitted to the EPA to replace Kern County Rules 203, 208 and 209 which are SIP approved. The District Rules are as stringent as the Kern County Rules, as shown on Tables 4, 5 and 6.

Table 4 - Comparison of District Rule 2031 and Kern County Rule 203

Requirement	District 2031	Kern 203
A PTO or an ATC shall not be transferable from location to location or from person to person unless a new application is filed and approved by the APCO.	✓	✓

Table 5 - Comparison of District Rule 2070 and Kern County Rule 208

Requirement	District 2070	Kern 208
ATC or PTO applications shall be denied unless the applicant shows that Health and Safety Codes Section 41700, 41701, or 42301 are not violated.	✓	
PTO applications shall be denied unless the applicant follows the ATC.	✓	✓
ATC or PTO applications shall be denied unless the applicant complies with Rule 2201.	✓	
ATC or PTO applications shall be denied unless the applicant will comply with both NSPS and NESHAP requirements.	✓	

Table 6 - Comparison of District Rule 2080 and Kern County Rule 209

Requirement	District 2080	Kern 209
The APCO may issue an ATC or PTO subject to conditions that shall be specified in writing.	✓	✓

5. District Rule 2040

Section 3.0 requires that every application for a permit shall be filed in a manner and form prescribed by the District. Condition 7 of the facility wide requirements assures compliance with this requirement.

District Rule 2040 has been submitted to the EPA to replace Kern County Rule 204 which is SIP approved. The District rule is as stringent as the Kern County rule, as shown on Table 7.

Table 7 - Comparison of District Rule 2040 and Kern County Rule 204

Requirement	District 2040	Kern 204
Every application for a permit shall be filed in the manner and form prescribed by the APCO and shall give all the information necessary to enable the APCO to determine whether to grant or deny a permit.	✓	✓
The APCO shall notify the applicant in writing in the event of a denial. The applicant may deem the Permit to Operate denied if the APCO fails to act on the PTO within 60 calendar days after filing. The applicant may petition the Hearing Board in writing for a public hearing in the event of an application denial.	✓	

6. District Rule 2520

Section 5.2 requires that the permittee submit applications for Operating Permit renewal at least six months prior to permit expiration. Condition 36 of the facility wide requirements assures compliance with this requirement.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Operating Permit:

Sections 9.5.1 and 9.5.2 contains requirements to incorporate all applicable recordkeeping requirements into the Operating Permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in conditions 8 and 9 of the facility wide requirements.

Section 9.6 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. All required reports must be certified by the responsible official. These requirements are stated in conditions 10 and 11 of the facility wide requirements.

Section 9.8 states that the Operating Permit must also contain a severability clause in case of a court challenge. The severability clause is stated in condition 12 of the facility wide requirements.

Section 9.9 contains requirements for provisions in the Operating Permit stating: 1) that the permittee must comply with all permit

conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Operating Permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Operating Permit. Compliance with these sections is assured by conditions 5 and 13 through 16 of the facility wide requirements.

Section 9.10 contains the requirement to provide in the Operating Permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in condition 17 of the facility wide requirements.

Section 9.14.1 requires that any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official of truth, accuracy, and completeness. Compliance with this section will be assured by condition 28 of the facility wide requirements.

Section 9.14.2 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements. Compliance with this section will be assured by conditions 18, 19, 20 and 21 of the facility wide requirements.

Section 9.17 requires that the permittee submit certification of compliance with the terms and standards of Operating Permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District). Condition 35 of the facility wide requirements assures compliance with this requirement.

Section 10.0 requires that any application form, report or compliance certification submitted pursuant to these regulations contain a certification of truth, accuracy, and completeness by a responsible official. Compliance with this section will be assured by condition 28 of the facility wide requirements.

7. District Rule 4101

EPA issued a relative stringency finding, dated August 20, 1996, stating that District Rule 4101 is more stringent than SIP approved Kern County Rule 401.

Section 5.0 of the rule prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart or is of an opacity greater than 20%. This requirement is stated in condition 22 of the facility wide requirements.

8. District Rule 4601

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of coating to no more than 250 grams of VOC/liter of coating (less water and exempt compounds). It also forbids the use of coating from the list in the Table of Standards (section 5.2) and limits the use of Specialty Coatings to a VOC content not to exceed the specified limits in Table 1 of Rule 4601. This rule further specifies labeling requirements, coating thinning recommendations, storage requirements and cleanup requirements. Conditions 23, 24, 25, 26 and 27 of the facility wide requirements assure compliance with this rule.

9. District Regulation VIII - Fugitive Dust (PM₁₀)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources such as construction, demolition, excavation, extraction, and water mining activities; outdoor storage piles; paved and unpaved roads. Compliance with these regulations is assured by conditions 31, 32 and 33. of the facility wide requirements.

10. 40 CFR Part 61, Subpart M - National Emissions Standards for Asbestos

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources. These requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance with these requirements is assured by condition 34 of the facility wide requirements.

11. 40 CFR Part 82, Subpart F - Stratospheric Ozone

There are applicable requirements from Title VI of the Clean Air Act (Stratospheric Ozone) that apply to all sources. These requirements pertain

to air conditioners, chillers and refrigerators located at a Title V source and to the disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in conditions 29 and 30 of the facility wide requirements.

The preceding discussion provided relative stringency demonstrations for all subsumed county SIP rules. Therefore, the shield as stated in condition 38 is appropriate.

3a. EPA COMMENT

....fuel sampling and annual stack testing are necessary to assure compliance with PM emissions limits....

DISTRICT RESPONSE

The District has added the statement “routine source testing shall be conducted every 24 months thereafter” to condition 4 of the requirements for permit units S-1394-2-1, -3-1 and -4-1. We have decided that annual source testing is more frequent than necessary to assure compliance for these very small boilers (18 MMBtu/hr) and we have therefore required bi-annual testing.

3b. EPA COMMENT

....weekly testing of the fuel [sulfur] content is appropriate....testing frequency could be reduced after compliance....has been demonstrated for eight consecutive weeks....define “fuel source” to include only fuels with similar characteristics....maintain records of when and where fuel oil comes from....

DISTRICT RESPONSE

Condition 19 has been added to the requirements for permit units S-1394-2-1, -3-1 and -4-1 to define the term “fuel source” and require that records be kept of fuel characteristics.

4. EPA COMMENT

Adequate periodic monitoring must be added [to the boiler permits] to assure compliance with the 20% opacity limit....

DISTRICT RESPONSE

Conditions 17 and 18 have been added to the requirements for permit units S-1394-2-1, -3-1 and -4-1 to require periodic monitoring of visible emissions.

5. EPA COMMENT

None of the permits for [the boilers] include the NO_x emissions rate of 2.3 lbm/bbl found in the ATCs and PTOs for these units....

DISTRICT RESPONSE

The 2.3 lbm/bbl NO_x limit is simply the AP-42 emission factor for uncontrolled crude oil fired boilers (equivalent to 55 lb NO_x / 1000 gal. oil). Hence, the District had not included the condition because there was no underlying applicable requirement. However, since the condition is contained on the ATC and the most recent PTO for these units, it has been included as condition 20 of the requirements for permit units S-1394-2-1, -3-1 and -4-1.

6. EPA COMMENT

Condition 8 [for boiler] does not include a requirement to annually determine fuel hhv....

DISTRICT RESPONSE

Condition 6 of the requirements for permit units S-1394-2-1, -3-1 and -4-1 provides for weekly fuel hhv testing. No change to condition 8 is necessary.

7. EPA COMMENT

....adequate periodic monitoring is necessary to show that the materials in the crude oil tanks will stay below the TVP of 1.5 psia....

DISTRICT RESPONSE

Neither District Rule 4623 nor 40 CFR 60 Subpart Ka specify a frequency for TVP determinations. However, for crude oil it is not expected that TVP would vary significantly and certainly we would not expect TVP to exceed 1.5 psia. Therefore, a yearly determination is appropriate for these permit units. However, the existing condition requiring determination of TVP has been revised to specify that TVP will be determined using methods from both District Rule 4623 and 40 CFR 60 Subpart Ka.

PUBLIC COMMENTS / DISTRICT RESPONSE

The public comments regarding the proposed Title V Operating Permit for Chevron Kettleman Compressor Station (District facility S-1394) are encapsulated below followed by the District's response. A copy of Chevron Pipeline Company's April, 22 1998 letter is available at the District office.

1. PUBLIC COMMENT

Every permit condition that is not federally enforceable needs to have a statement in it specifying this to fully comply with the Title V permit regulations in 40 CFR 70.6(b)(2).

DISTRICT RESPONSE

The citation in 40 CFR 70.6(b)(2) applies only to a facility's Title V permit, not to any District-only permits. As stated in section VIII of the engineering evaluation for this proposed permit, "...the District issues a single permit that contains the federally enforceable requirements as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permit. The terms and conditions that are part of the facility's Title V permit are designated as 'federally enforceable through the Title V permit'..." Hence, the conditions that are not part of the Title V permit need no special designation on the permit.

2. PUBLIC COMMENT

....Amend condition 2 for permit units -2-1, -3-1 and -4-1....change language from "invoices, purchase contracts, supplier certifications"....since the current language is not applicable to the Bitterwater Station....

DISTRICT RESPONSE

The language has been revised to read "Copies of all data used to determine compliance with the conditions of this permit shall be maintained".

3. PUBLIC COMMENT

....Amend conditions 10 and 20 for permit units -2-1, -3-1 and -4-1 to specify "nitrogen dioxides" rather than NO2....

DISTRICT RESPONSE

The language was clarified as requested.

4. PUBLIC COMMENT

....Amend conditions 17 and 18 for permit units -2-1, -3-1 and -4-1 to reference "boiler" rather than heater....

DISTRICT RESPONSE

The language was revised as requested.

5. PUBLIC COMMENT

....Amend condition 19 for permit units –2-1, -3-1 and –4-1 to change language to “API gravity, sulfur content, and higher heating value” from ‘origin and type of oil fired...’

DISTRICT RESPONSE

The requested revision clarifies the intent of the original condition and was therefore made as requested.

6. PUBLIC COMMENT

....Add to condition 4 for permit unit –56-1 the phrase “or operator shall use commercial grade LPG for fuel and shall maintain invoice records”....

DISTRICT RESPONSE

As shown in the engineering evaluation for this proposed permit, the use of commercial grade LPG will satisfy the requirements of all District rules for this unit. Therefore, the language was added as requested.